



Air Quality Permitting Statement of Basis

May 31, 2005

Permit to Construct No. P-050501

Norsun Food Group, Inc., Sugar City, Idaho

Facility ID No. 065-00013

Prepared by:

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AIR QUALITY DIVISION**

FINAL

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURES	3
1. PURPOSE	4
2. FACILITY DESCRIPTION	4
3. FACILITY / AREA CLASSIFICATION.....	4
4. APPLICATION SCOPE	4
5. PERMIT ANALYSIS.....	4
6. PERMIT FEES	6
7. PERMIT REVIEW.....	6
8. RECOMMENDATION.....	6
9. AIRS.....	6
APPENDIX A – AIRS INFORMATION TABLE.....	7

Acronyms, Units, and Chemical Nomenclatures

AIRS	Aerometric Information Retrieval System
DEQ	Department of Environmental Quality
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MMBtu	Million British thermal units
PTC	Permit to Construct

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

2. FACILITY DESCRIPTION

Norsun Food Group, Inc. (Norsun) operates a cooked potato processing plant. The Norsun facility consists of three separate processing lines: Lines A, B, and C. Line A and Line B, which are nearly identical, process raw potatoes to various cut and cooked potato products. Line C processes raw potatoes to whole baked potatoes. Norsun uses natural gas exclusively for its combustion sources (i.e. the boiler, ovens, steam peeler, and several space heaters located throughout the facility).

3. FACILITY / AREA CLASSIFICATION

This facility is classified as a minor facility because its potential to emit is less than all major source thresholds. The facility is not a designated facility as defined by IDAPA 58.01.01.006.27. The facility's natural gas-fired boiler is subject to NSPS requirements in accordance with 40 CFR 60, Subpart Dc, but only for initial notification and fuel recordkeeping and reporting. The facility is not subject to any NESHAP or MACT requirements. The SIC code defining the facility is 2037 and the AIRS facility classification is "B."

The facility is located within AQCR 61 and UTM zone 12. The facility is located in Madison County, which is designated as unclassifiable for all criteria pollutants (PM₁₀, CO, NO_x, SO₂, lead, and ozone).

The AIRS information provided in Appendix A defines the classification for each regulated air pollutant at Norsun. This required information is entered into the EPA AIRS database.

4. APPLICATION SCOPE

Norsun Food Group, Inc. (Norsun) submitted a PTC revision application requesting corrections to the following information: the manufacturer's name and model numbers of the A-line and B-line process ovens in Permit Condition 4.1; and replace "raw potato product" in Permit Condition 4.4 and 4.6 with "finished potato product."

In addition, Norsun agreed to change "Records of this information shall be kept on site for the most recent two-year period and shall be made available to DEQ representatives upon request." in Permit Condition 4.6 to "Records of this information shall be maintained in accordance with Permit Condition 2.11." to keep the reporting requirement consistent throughout the permit.

4.1 Application Chronology

February 28, 2005

DEQ received a PTC revision application

5. PERMIT ANALYSIS

Please defer to the Statement of Basis developed for PTC No. P-040511, issued January 27, 2005.

5.1 Equipment Listing

Except for the corrections to the manufacturer's names and model numbers of A-line and B-line process ovens as listed in the following, other information regarding equipment list can be deferred to the Statement of Basis developed for PTC (P-040511) issued January 27, 2005.

- Natural gas-fired A, B, and C-Line process ovens – 30.0 MMBtu/hr total heat input:

The APV A-Line process oven was manufactured by Enersyst in 1989. The oven's model number is Jet Sweep 34. The oven has six burners manufactured by Eclipse (model number RM200); each with a rated heat input capacity of 2.0 MMBtu/hr. Natural gas is used exclusively as the fuel type. Emissions exit through a single stack that is 33.08 feet in height from ground level. The stack diameter is eight inches x eight inches. In accordance with the application, the A-line oven is nearly identical to the B-line oven.

The Kiremko B-Line process oven was manufactured by Kiremko BV in 1999. The oven's model number is R0755-IMP-99. The oven has eight burners manufactured by Eclipse (model number RM200); each with a rated heat input capacity of 2.0 MMBtu/hr. Natural gas is used exclusively as the fuel type. Emissions exit through a single stack that is 35.0 feet in height from ground level. The stack diameter is 17.5 inches x 31.5 inches. Both A, and B-line ovens provide various cut and cooked potato products.

5.2 Emissions Inventory

No change of emissions is associated with this permit action. Therefore, no emissions inventory is needed for this permit action. However, the emissions inventory for the permit can be deferred to the Statement of Basis developed for PTC (P-040511) issued January 27, 2005.

5.3 Modeling

No emissions increase associated with this permit action. Therefore, modeling is not required for this permit action. However, the modeling analysis for the permit can be deferred to the Statement of Basis developed for PTC (P-040511) issued January 27, 2005.

5.4 Regulatory Review

Please defer to the Statement of Basis developed for PTC No. P-040511, issued January 27, 2005.

5.5 Permit Conditions Review

This section describes only those permit conditions that have been revised, modified or deleted as a result of this permit action. All other permit conditions remain unchanged.

5.5.1 The corrections of manufacturer's names and equipment model numbers are made to Permit Condition 4.1. It reads as the following:

"4.1 Process Description"

The APV A-Line process oven was manufactured by Enersyst in 1989. The oven's model number is Jet Sweep 34. The oven has six burners manufactured by Eclipse (model number RM200); each with a rated heat input capacity of 2.0 MMBtu/hr. Natural gas is used exclusively as the fuel type. Emissions exit through a single stack that is 33.08 feet in height from ground level. The stack diameter is eight inches x eight inches.

The Kiremko B-Line process oven was manufactured by Kiremko BV in 1999. The oven's model number is R0755-IMP-99. The oven has eight burners manufactured by Eclipse (model number RM200); each with a rated heat input capacity of 2.0 MMBtu/hr. Natural gas is used exclusively as the fuel type. Emissions exit through a single stack that is 35.0 feet in height from ground level. The stack diameter is 17.5 inches x 31.5 inches."

5.5.2 "raw potato product" in Permit Conditions 4.4 and 4.6 is replaced with "finished potato product". Permit Condition 4.4 was developed based the source test data. The "finished potato product" was recorded in that source test as the production parameter.

5.5.3 "Records of this information shall be kept on site for the most recent two-year period and shall be made available to DEQ representatives upon request." in Permit Condition 4.6 is replaced with "Records of this information shall be maintained in accordance with Permit Condition 2.11." to keep the reporting requirements consistent throughout the permit.

6. PERMIT FEES

In accordance with IDAPA 58.01.01.224 and 225, PTC application and processing fees do not apply because the permitting action is a correction of typographical errors and there is no emissions increase.

7. PERMIT REVIEW

The draft permit was made available for Idaho Falls Regional Office review on May 1, 2005. No comments were received.

7.2 Facility Review of Draft Permit

Norsun didn't request to review the facility draft PTC.

7.3 Public Comment

In accordance with IDAPA 58.01.01.209.04, an opportunity for public comment is not required for this permitting action because there is no emissions increase

8. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommends that Norsun Food Group, Inc. be issued revised PTC No. P-050501. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

9. AIRS

Emissions are not increasing with the permit revision, therefore, the AIRS information is not changing. Please defer to the Statement of Basis developed for PTC No. P-040511, issued January 27, 2005.

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Permit No. P-050501

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Appendix A

AIRS Information

Permit to Construct No. P-050501

Norsun Food Group, Inc., Sugar City

Facility ID No. 065-00013

Table A.1 AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION A – Attainment U – Unclassifiable N – Nonattainment
POLLUTANT							
SO ₂	B						U
NO _x	B						U
CO	B						U
PM ₁₀	B		Dc				U
PT (Particulate)	B						
VOC	B						U
THAP (Total HAPs)	B						
			APPLICABLE SUBPART				

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 T/yr threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.

SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.

B = Actual and potential emissions below all applicable major source thresholds.

C = Class is unknown.

ND = Major source thresholds are not defined (e.g., radionuclides).